

BEFORE THE

Queenstown Lakes District
Council

IN THE MATTER OF

Resource Management Act
1991

AND

IN THE MATTER OF

Upper Clutha Landscape
Schedules Variation

**SPEAKING NOTES OF RACHEL SHALINI THOMAS AND ANNA MICHELLE GILLESPIE
ON BEHALF OF THE OTAGO PROVINCE OF FEDERATED FARMERS OF
NEW ZEALAND**

Dated 2 September 2026

PRESENTATION OF RACHEL THOMAS

1. Good morning. Thank you for the opportunity to present today. My name is Rachel Thomas and I am a Senior Policy Advisor with Federated Farmers. With me is Anna Gillespie who is the president of Otago Federated Farmers.
2. We are giving this evidence as lay evidence, representative of our members within the Otago region. As such, we have taken a high-level approach, focussing on the overall intent of the schedules, as opposed to arguing for changes to specific activities within schedules. We acknowledge that many of our members are taking the latter approach and we support them in doing so.
3. Our primary relief is Option 2 which was presented in the Council's own s32 evaluation. Option 2 is to schedule the Mata-au Clutha River, and not introduce the twelve non-PA schedules. In our view, the Joint Witness Statement has called into question the two assumptions behind the s.32's preference for scheduling all areas, which was Option 3 in the report.
4. The s32 counted case-by-case landscape assessment as a cost of Option 2 and recorded no economic cost for Option 3. The Joint Witness Statement confirms site-specific assessment is required either way. That cost falls on both options, not one.
5. The s32 also stated the risk of Option 2 was that the proposed district plan's policy direction for RCLs would not be achieved. The experts agree there is no direction to schedule non-PA areas, and no scope in this Variation to create one. Therefore, if Option 2 is pursued, nothing in the Plan's policy direction goes unachieved. The existing framework continues to apply to the non-PA areas.
6. Another matter we wish to highlight is the NPS-HPL. Just under 35 per cent of the scheduled areas are mapped as highly productive land. The s32 sets the NPS-HPL aside in two lines and the s42A does not address it at all. Earthworks, farm buildings and intensive agriculture are ways land-based primary production is carried out on that land. The s42A addresses the NPS for Electricity Networks and the NPS for Renewable Energy. It does not address the one instrument directed at land-based primary production, on land where over a third of the area is mapped as highly productive. This was

raised during discussions yesterday, and Ms Frew implied that regardless of the NPS-HPL the plan provisions would still remain. We acknowledge this is correct, however the question is not whether the provisions remain, but whether an instrument directed at protecting this land for land-based primary production should be evaluated before landscape capacity ratings are applied to over a third of it. That evaluation has not been undertaken. If the Panel is now of the mind to consider removing the ratings, the further evaluation required under s32AA is the opportunity to do it.

7. We also wish to highlight the uniformity in the ratings. Six activities carry an identical rating in all twelve schedules. Earthworks is limited everywhere. Farm buildings is some everywhere. Intensive agriculture is some in eleven of twelve. A rating that is the same in every landscape cannot help a decision-maker distinguish one location from another. That has not improved through the process. Urban expansions varied at notification and are now uniform in the Rebuttal Version.
8. Across the s32 and the s42A the Council has identified potential cost reductions and no cost increases. That sits against Ms Frew's own position that a finer-grain, proposal-specific assessment will typically still be required. The schedule does not replace that assessment. It is an additional document the assessment must address, and Mr Skelton's experience is that ratings are in practice given more weight than the Preamble intends.
9. We understand that the plan provisions remain regardless of whether the capacity ratings sit within the Schedules. That is the difficulty. If the ratings are removed but the Schedules are retained, the Council must still have regard to the landscape character and visual amenity values identified. The Schedule remains engaged at the same threshold, by the same rules, on the same activities. What changes is that the stated conclusion is removed while the descriptive and evaluative content remains, and nothing in the framework tells a farmer, a planner or a commissioner what weight that content carries. Farmers should be able to read the Plan and understand what is required of them, without engaging a planner and a landscape architect to interpret a further document. Removing the ratings alone does not achieve that. If the Schedules are to be retained, the Preamble should state expressly that their content is engaged only where an activity requires consent at restricted

discretionary level or above, and that it does not direct what mitigation is appropriate or what outcome should be achieved.

10. If the Panel does not agree with us on Option 2, our alternatives are in paragraphs 53 and 54. Specifically, remove the ratings for earthworks, farm buildings, intensive agriculture and rural living.

PRESENTATION OF ANNA GILLESPIE

11. The character these schedules describe is not natural. All of it is there because someone has been farming it for 150 years, and it will stay there only while farming remains viable. The landscapes include rural living, productive farming activities, and pasture. Farming creates the character of these landscapes.
12. Farmers are facing significant costs for consenting, particularly within this district. Routine farm activities such as earthworks should not require multiple specialist reports. The Council has argued that these schedules will save some of the work a landscape architect would do, but in our view they will do the opposite. If a landscape architect has yet another document to consider, that will only increase the cost. We have shown how the landscape ratings do not differ across the landscapes for certain activities which are important for routine farming. Removing these activities from the schedules would still give the Council the ability to manage the effects of those activities through the district plan. We do not see why an additional layer of assessment is necessary.
13. There is also the question of whether an ordinary person can follow any of this. To understand where these schedules came from, a farmer has to work through multiple Environment Court decisions, Council reports, the Preamble and the schedule itself. The Council is running a session later this year to teach landscape architects how to apply the Preamble. If the professionals need that, a farmer reading a schedule on their own has no chance.
14. I would like to respond to the table produced by Ms Frew and uploaded to the website yesterday evening. The table shows farm buildings are permitted subject to eight standards under Rule 21.8. The buildings a modern farming operation requires do not meet them in many instances. A wintering barn, a covered feed pad, a modern woolshed or a calf shed exceeds 300m² in

ground floor area and 10 metres in height because the footprint and clearance are dictated by stock numbers, machinery and animal welfare requirements rather than by choice. The density standard compounds this: at one building per 50 hectares, a 200 hectare property reaches its permitted limit at four buildings, so a property with a woolshed, an implement shed, a hay barn and a covered yard requires consent for the next building of any size. The practical position is not that consent is occasionally required for large or unusual structures, but that consent is required for the ordinary buildings a working farm needs, and that on breach of any one standard the activity becomes restricted discretionary with discretion including landscape character and rural amenity values.

15. We are the ones maintaining this landscape and we have the strongest interest in keeping it. If routine farming gets slower and more expensive, the long-run response is land use change, and that is what actually erodes the character these schedules are intended to protect.
16. We ask the Panel to take the opportunity the Joint Witness Statement provides and adopt Option 2, or alternatively remove the capacity ratings for the activities which impact farmers.
17. Federated Farmers thanks the Hearing Panel for the opportunity to present this evidence statement.



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